

3 April 2018

Planning Policy  
Cheltenham Borough Council

Dear Sirs,

## **CPRE: CHELTENHAM PLAN PRE-SUBMISSION REPRESENTATION**

Attached please find a completed representation form from CPRE Cheltenham, Gloucester and Tewkesbury District. Since the information sought in the form is limited to issues of legal compliance and soundness CPRE wishes to make some additional comments for your consideration.

Noting that it must conform with the JCS, in general terms CPRE welcomes the Plan and supports its Vision, Themes and Policies.

### **Landscape and the AONB (Sections 7 and 8)**

The Context statement at 7.1 makes clear that the town's eastern fringes are in the Cotswolds AONB. Section 8, which covers the AONB, of itself contains no policies since AONB policy is set out in JCS Policy SD7. It needs to be made explicitly clear that the policies set out in Section 7 are supplementary to those of the JCS. This is important in respect especially of Policy L2 which is concerned with conversion of rural buildings. For example, Policy L2 might be used to justify converting into dwellings agricultural buildings which have been newly erected in the AONB so as to evade planning restrictions.

### **Residential Development (Section 11)**

CPRE broadly supports the approach to residential development set out in the Plan, in particular the focus on the reuse of 'brownfield' land. Any necessary greenfield developments should be phased and take place later in the Plan period.

We continue to have concerns about the development of Priors Farm Fields because of the effect on the setting of the AONB. We are pleased to note that this sensitivity is recognised by Policy HD2.

We have much greater concern about the proposals for Leckhampton at MD5. While the provision of up to 250 dwellings on land adjacent to the Shurdington Road is tolerable, we challenge the justification for and sustainability of building a new secondary school off Kidnappers Lane. On traffic grounds alone, such a school makes no sense in an area that is already seriously congested at peak times even before the new houses at Farm Lane, let alone the additional dwellings proposed under this policy, are occupied. You may recall that this was a principle reason why the earlier appeal to build at this site was dismissed.

In our view, it makes much better sense for any required new secondary school to be sited close to a major urban extension such as at NW Cheltenham.

### **Housing Mix and Standards (Section 12)**

CPRE strongly supports the increased provision of Affordable Housing (12.2 – 7) and in particular the encouragement of proposals to bring vacant floor-space above shops back into residential use (12.5). The policies proposed under this section are welcome.

### **Green Infrastructure (Section 16 and elsewhere)**

Although this topic has its own section, Section 16, it is relevant to and referred to in other sections of the Plan, for example those on Employment, Biodiversity, Residential Development and Social and Community Infrastructure (Sections 3, 10, 12 and 17). However, the topic seems to have been treated in a piecemeal fashion. Nowhere can we find explicit reference to the need for new developments to plan for and incorporate green infrastructure comprehensively throughout the development process. This approach would take account of existing natural features, such as open spaces and watercourses and would incorporate necessary drainage systems. In this context, it would be very helpful for the Plan to make specific reference to the recent 'Building with Nature' methodology currently being adopted for the Elms Park development.

CPRE strongly supports the provision of Local Green Space as set out in Policy GI1 and Table 8. However, we are disappointed that at West Cheltenham this is presented mostly as a long thin strip of land, separating new development from the existing conurbation. In our view there should in addition be at least one broader stretch of LGS extending into the area of the urban extension to coincide with existing footpaths.

### **Renewable Energy (Section 18)**

This short section seems to concern itself only wind energy generation. Failure also to consider photo-voltaic arrays is a missed opportunity. CPRE believes the Plan should include policies for the provision of PVAs on buildings and other structures, especially on commercial buildings, in accordance with industry best practice.

David Bayne  
For Tom Hancock DL, Chairman